

# **Exhibit M**

**UNITED STATES DISTRICT COURT**  
**SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN)  ECF Case
This document relates to:  <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN)  ECF Case

**DECLARATION OF SHARON PREMOLI**

COMES NOW the declarant, SHARON PREMOLI, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.

1. I was a citizen of the United States on September 11, 2001, and remain so today. Attached as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.
2. I was at work on the 80th floor of the World Trade Center’s North Tower in New York City on September 11, 2001, when an American Airlines Boeing 747 passenger jet, hijacked and piloted by terrorists, plunged into the 93rd floor of our Tower and tore through the

entire width of the building, detonating destruction, mayhem and unspeakable carnage that would endure for almost 2 hours without pause—and in the horrific memories of survivors like me, for a lifetime.

3. After my slow, terrifying descent from the 80th floor, I was directed to the lobby, which had been completely blown out by the explosion from the plane's fuel. I fell, cutting my hand and injuring my foot against the cement and debris.

4. I reached the Plaza level of 5 World Trade Center, within steps of an exit to safety, when the South Tower, less than 130 feet away collapsed on top of us and its millions of tons of concrete, glass, and the remains of its slain occupants slammed into us like a tsunami at close range. I was thrown into the air, then hurled full-force into a plate glass window and fell to the ground, unconscious and quickly covered in a dark shroud of debris.

5. A New York City detective found me buried in the rubble, barely conscious and tried to administer oxygen, but my windpipe and nose were blocked and my mouth filled with the dust. I was choking, numb, catatonic, my eyes caked in glass and dirt, lungs burning and pain intensifying in my chest and limbs. To my horror, I discovered I was lying on top of a bleeding dead body or torso. My body was soon flooded with fear and cortisol, allowing me to stand with the police officer's help. As a result of severe trauma, I then experienced what is referred to medically as "disassociation" a split with reality during extreme trauma, where I believed I was dead. I had to force myself to "come back". This terrifying "split" happened once more while we were existing the building.

6. All exits were blocked by the collapse but because we were trapped with the police detective and two fire fighters, I am told they were able to break through the plate glass doors of Citibank or Borders' Book Store using their oxygen tanks, then lead us to the exit on Vesey Street via the "survivors' staircase". in time to see the second tower collapse and a huge grey wall of toxic dirt bearing down upon me yet again. Remarkably, I managed to stumble out of the nuclear winter and survived. As I staggered down the street, a wonderful couple, total strangers, Fred and Lynn Hill took me into their home and cared for me until I was able to leave.


I was sick following the attacks and experienced shock for several days. I also experienced pain and memory problems for weeks and could not read properly for almost ten years.

7. More accurately, I began the *process of survival*. Today, I suffer from excruciating full-body neuropathy, muscle weakness, cognitive impairment caused by traumatic brain injury, impaired hearing, uninterrupted tinnitus, and reduced lung function and chronic rhinosinusitis linked to the dangerous inhalants within the World Trade Center towers, including both pulverized alkaline dust from fragmented building materials and chemical products from explosions and burning of building materials. Because of my damaged sinuses, I am vulnerable to sinus infections and pneumonia because they drain into my lungs.

8. I also suffered from traumatic brain injury and related severe cognitive impairment and continue to suffer profound post-traumatic stress. I could not read a book until 2010 and never returned to work. The VCF considered these and other disabling injury to be non-physical in nature and therefore non-compensable. Attached as Exhibit B to this Declaration is a true and correct copy of my medical records related to the treatment that I received following the September 11, 2001 terrorist attacks.

I DECLARE, VERIFY AND STATE UNDER PENALTY OF PERJURY that the foregoing is true and correct.

DATED this 31<sup>st</sup> day of December, 2019.

  
SHARON PREMOLI

# **Exhibits Filed Under Seal**